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9 **UNITED STATES BANKRUPTCY COURT**
 10 **DISTRICT OF NEVADA**

In re

11 CASH CLOUD, INC.,
 12 dba COIN CLOUD,

Debtor.

Case No. BK-S-23-10423-MKN

Chapter 11

13 **DEBTOR'S THIRD OMNIBUS MOTION FOR**
 14 **ENTRY OF ORDER APPROVING**
 15 **REJECTION OF EXECUTORY CONTRACTS**
 16 **AND UNEXPIRED LEASES**

Hearing Date: April 20, 2023

Hearing Time: 10:30 a.m.

Estimated Time for Hearing: 20 Minutes

17 **PLEASE TAKE NOTICE THAT IF YOU ARE RECEIVING NOTICE OF THIS MOTION,**
 18 **YOU SHOULD LOCATE YOUR NAME AND CONTRACT OR LEASE LISTED ON**
 19 **EXHIBIT 2 ATTACHED HERETO. NAMES ARE LISTED ALPHABETICALLY WITH THE**
CORRESPONDING CONTRACT OR LEASE

20 Cash Cloud, Inc. ("Cash Cloud" or "Debtor"), debtor and debtor in possession in the above-
 21 captioned chapter 11 case (the "Chapter 11 Case"), by and through its undersigned counsel, Fox
 22 Rothschild LLP, respectfully submits this motion (the "Motion") for entry of an order, substantially
 23 in the form attached hereto as **Exhibit 1**, and approving the rejection of contracts as set forth in
 24 **Exhibit 2** attached hereto pursuant to Bankruptcy Code¹ section 365(a).

25 _____
 26
 27 ¹All references to "chapter" and "section" herein shall be to the "Bankruptcy Code" appearing in Title 11 of the U.S.
 28 Code; all references to a "Bankruptcy Rule" shall refer to the Federal Rules of Bankruptcy Procedure.

This Motion is made and based on the *Declaration of Christopher Andrew McAlary* (the “McAlary Declaration”) filed in support hereof, the following points and authorities, the papers and pleadings on file with the Court in this Chapter 11 Case, and any oral argument the Court may entertain at the hearing on the Motion.

Dated this 17th day of March, 2023.

FOX ROTHSCHILD LLP

By: /s/ Jeanette E. McPherson

JEANETTE E. MCPHERSON, ESQ. (5423)

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POINTS AND AUTHORITIES

I. JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A) & (O).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory basis for the relief requested herein is 11 U.S.C. §§ 105(a), 365(a), and 554, and Bankruptcy Rules 6006, 6007, and 9014.

4. Pursuant to Local Rule 9014.2, the Debtor consents to entry of final order(s) or judgment(s) by the bankruptcy judge if it is determined that the bankruptcy judge, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

II. BACKGROUND

A. Debtor’s Filing

5. On February 7, 2023 (the “Petition Date”), the Debtor filed with this Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

6. The Debtor is authorized to operate its business and manage its property as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

7. No request has been made for the appointment of a trustee or examiner. An Official Committee of Unsecured Creditors was appointed on or about February 17, 2023.

B. Debtor's Business

8. As described in greater detail in the Omnibus Declaration of Christopher Andrew McAlary in Support of Emergency First Day Motions [ECF 19], the Debtor was formed as a Nevada corporation for the purpose of providing a platform for customers to buy and sell digital currencies through Digital Currency Machines ("DCMs") distributed across the United States. DCMs are an advanced version of the kiosks commonly referred to as Bitcoin ATMs or BTMs, that enable a consumer to both (a) buy bitcoin as well as 30+ other digital currencies with cash, and (b) sell digital currency for cash. See McAlary Declaration ¶ 6. As of December 31, 2022, the Debtor operated approximately 4,800 DCMs, or kiosks, throughout the United States and Brazil, installed in some of the largest convenience, grocery and liquor store chains and prestigious malls. See McAlary Declaration ¶ 6.

C. Office Lease

9. The Debtor was a party to an Office Lease ("Lease") with TSSP LLC ("TSSP") for the lease of real property located at 10190 Covington Cross Drive, Las Vegas, Nevada 89144 (the "Premises").

10. The Debtor filed a Debtor's Motion For Approval Of Rejection Of Unexpired Lease With TSSP LLC Pursuant To 11 U.S.C. § 365(a) And Abandonment Of Any Property That Remains At Premises [ECF 103], and this motion has been granted. [ECF 172]. The Lease was rejected as of February 28, 2023.

D. Rejection of Contracts

11. The Debtor is a party to several executory contracts related solely to the use of the Premises, including: services for internet services, coffee services, fire protection, elevator services, pest control, outdoor cleaning services, uninterruptible power supply (UPS) maintenance and emergency service, fire equipment maintenance services, landscaping, ice, drinking water, trash and recycling, security alarm systems, and fire alarms systems, maintenance, telephone services, water services, electricity, and natural gas services.

12. Given that the Debtor rejected the Lease with TSSP and vacated the Premises as of February 28, 2023, the Debtor is no longer in need of the contracts related to the use of the Premises including the contracts listed below, and therefore seeks to reject them. These contracts are with the following parties (“Counterparty” or “Counterparties”).

- 1) Bailey’s Sweeper Service
- 2) CenturyLink Communications, LLC d/b/a Lumen Technologies Group
- 3) Cox Business
- 4) Daich’s First Choice Coffee Services
- 5) DC Group, Inc.
- 6) Desert Fire Protection, L.P.
- 7) G&G Systems
- 8) High Desert Landscape & Design
- 9) Las Vegas Pest Control
- 10) Las Vegas Valley Water District
- 11) NextGen
- 12) NV Energy
- 13) Otis Elevator Company
- 14) Quench USA, Inc.
- 15) Republic Silver State Disposal, Inc. dba Republic Services of Southern Nevada (2 Accounts)
- 16) Siemens Industry, Inc.
- 17) Southwest Gas
- 18) West Coast Water Solutions, LLC

(collectively, the “Contracts”). The Counterparty and the Counterparty’s address is fully set forth on **Exhibit 2** attached hereto.

13. In connection with its efforts to preserve and maximize the value of its estate through the prosecution of this case, the Debtor, in its business judgment, has determined that the Contracts are financially burdensome and do not provide benefit to the estate, and are no longer needed. Further, the Debtor seeks to avoid depletion of the estate through accrual of administrative expenses associated with these Contracts. In addition, the Debtor has determined that there is no value in attempting to assume and assign the Contracts. Thus, rejection is in the best interests of creditors and other parties in interest. As such, the Contracts should be rejected. See McAlary Declaration ¶

11.

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1 **E. Requested Relief**

2 14. Bankruptcy Code section 365(a) authorizes the Debtor, subject to this Court's
3 approval, to reject any executory contract or unexpired lease. Based on its business judgment,
4 Debtor has determined that the Contracts are financially burdensome to the estate and do not
5 provide benefit to the estate. See McAlary Declaration ¶ 11. Accordingly, the Debtor seeks
6 authority to reject the Contracts set forth on **Exhibit 2** as of filing of this Motion to prevent the
7 incurrence of ongoing administrative expenses with respect to the Contracts. See McAlary
8 Declaration ¶ 12.

9 **III. MEMORANDUM OF LAW**

10 **A. The Debtor's Decision To Reject The Contracts Should Be Approved**

11 15. Section 365 of the Bankruptcy Code provides that "the trustee, subject to the court's
12 approval, may assume or reject any executory contract or unexpired lease of the debtor." 11 U.S.C.
13 § 365(a). "Under the Code, most courts have applied a 'business judgment' test to trustees'
14 decisions to assume or reject contracts or leases." 3 Collier on Bankruptcy ¶ 365.03[2] (16th Ed.
15 2016). "In making its determination, a bankruptcy court need engage in only a cursory review of a
16 debtor-in-possession's decision to reject the contract." Agarwal v. Pomona Valley Med. Group,
17 Inc. (In re Pomona Valley Med. Group, Inc.), 476 F.3d 665, 670 (9th Cir. 2007) (internal
18 punctuation omitted).

19 16. "[I]n evaluating the rejection decision, the bankruptcy court should presume that the
20 debtor-in-possession acted prudently, on an informed basis, in good faith, and in the honest belief
21 that the action taken was in the best interests of the bankruptcy estate." Id., at 670. In the Ninth
22 Circuit, a bankruptcy court "should approve the rejection of an executory contract under § 365(a)
23 unless it finds that the debtor-in-possession's conclusion that rejection would be advantageous is so
24 manifestly unreasonable that it could not be based on sound business judgment, but only on bad
25 faith, or whim or caprice." Id. (internal punctuation omitted).

26 17. The Debtor's decision to reject the Contracts reflects the Debtor's exercise of sound
27 business judgment and is in the best interests of the Debtor, its estate, and its creditors. The Debtor
28 has determined that the Contracts are not necessary for the Debtor's operations and are financially

1 burdensome and not beneficial to the estate. The Contracts are not a source of potential value for the
 2 Debtor's future operations, creditors, or interest holders, and are believed to not be marketable
 3 given their terms and constitute an unnecessary drain on the Debtor's limited resources. See
 4 McAlary Declaration ¶ 11. Accordingly, the Debtor submits that its decision to reject the Contracts
 5 is a sound exercise of its business judgment and should be approved.

6 **B. Rejection Of the Contracts As of Motion Filing Date**

7 18. This Court has authority to approve the rejection of executory contracts or leases as
 8 of a certain date. Section 365 of the Bankruptcy Code does not expressly provide whether courts
 9 may order rejection to be effective retroactively. However, courts have held that bankruptcy courts
 10 may exercise their equitable powers in granting such a retroactive order when they conclude that
 11 doing so promotes the purposes of Section 365, and that after balancing the equities of a case,
 12 equities weigh in favor the debtor. See, e.g., Pac. Shores Dev., LLC v. At Home Corp. (In re At
 13 Home Corp.), 392 F.3d 1064, 1065 (9th Cir. 2004) (affirming order authorizing rejection as of date
 14 of filing of motion), cert. denied, 564 U.S. 814 (2005); Thinking Machines Corp. v. Mellon Fin.
 15 Servs. Corp. (In re Thinking Machs. Corp.), 67 F.3d 1021, 1028-29 (1st Cir. 1995) (bankruptcy
 16 court has power to approve rejection as of date of filing motion); In re Amber's Stores, Inc., 193
 17 B.R. 819, 827 (Bankr. N.D. Tex. 1996)(holding that the lease should be deemed rejected as of the
 18 petition date due to the equities of case). Although this caselaw pertains to the rejection of
 19 nonresidential real property leases, the rationale contained therein is applicable to executory
 20 contracts. The Ninth Circuit in In re At Home Corp., explained that "the equitable authority
 21 recognized in Thinking Machines has been imported to contexts other than unexpired nonresidential
 22 leases," citing to Malden Mills Indus., Inc. v. Maroun (In re Malden Mills Indus., Inc.), 303 B.R.
 23 688, 701 (B.A.P. 1st Cir. 2004) and its application of this principle to abandonment of personal
 24 property. 392 F.3d at 1070. The Debtor further notes that the Ninth Circuit's holding in In re At
 25 Home Corp., 392 F.3d 1064 (9th Cir. 2004) allowing rejection as of the date of the motion has been
 26 found to be undisturbed by the Court's holding in Roman Catholic Archdiocese of San Juan v.
 27 Acevedo Feliciano, ___ U.S. ___, 140 S.Ct. 696 (2020). See In re Player's Poker Club, Inc., 636
 28 B.R. 811 (Bankr. C.D.Cal. 2022).

19. Balancing the equities in this case, approving rejection of the Contracts as of the date of this Motion is appropriate. The Debtor has promptly filed this Motion and promptly set it for hearing upon gathering all relevant information and addressing contract issues with its former landlord. The Debtor has given Counterparties notice of this Motion and the Debtor's intention. Without the authority to reject as of the Motion filing date, the Debtor may be forced to incur potential administrative expenses for agreements that provide no benefit to the estate to the detriment of creditors and other stakeholders. Further, allowing the Debtor to reject the Contracts will not unduly prejudice the Counterparties because the Counterparties will receive notice of the Motion and therefore will have sufficient opportunity to object if they so choose. Indeed, the Counterparties may benefit from the rejection as they will be relieved of obligations under the Contracts. Accordingly, the rejection of the Contracts should be approved as of the date of the Motion.

IV. RESERVATION OF RIGHTS

20. Nothing contained herein is intended or should be construed as an admission of the validity of any claim against the Debtor, a waiver of the Debtor's rights to dispute any claim, or an approval or assumption of any agreement, contract, or lease under section 365 of the Bankruptcy Code. The Debtor expressly reserves its rights to contest any invoice or claim related to the relief requested herein in accordance with applicable law.

V. NOTICE

21. Notice of this Motion has been given by electronic mail or first class mail to the following parties or their counsel: (a) the Office of the United States Trustee for the District of Nevada; (b) counsel for the Official Committee of Unsecured Creditors; (c) counsel to Debtor's secured creditors; (d) the counterparties to the Contracts; and (e) all parties that have filed a Rule 2002 Notice Request in the Chapter 11 Case. In light of the nature of the relief requested, Debtor respectfully submits that such notice is appropriate and sufficient under the circumstances and that no further notice is necessary.

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VI. CONCLUSION

WHEREFORE, for all of the foregoing reasons, Debtor respectfully requests that this Court enter an Order granting this Motion, substantially in the form attached hereto as **Exhibit 1**, and (a) approving the rejection of the Contracts set forth on **Exhibit 2** attached hereto, as of the date of the filing of this Motion; and (b) granting such other and further relief as this Court deems appropriate.

Dated this 17th day of March, 2023.

FOX ROTHSCHILD LLP

By: /s/ Jeanette E. McPherson

JEANETTE E. MCPHERSON, ESQ.

Nevada Bar No. 5423

BRETT A. AXELROD, ESQ.

Nevada Bar No. 5859

NICHOLAS A. KOFFROTH, ESQ.

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ZACHARY T. WILLIAMS, ESQ.

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EXHIBIT 1
PROPOSED ORDER

BRETT A. AXELROD, ESQ. (5859)
JEANETTE E. MCPHERSON, ESQ. (5423)
NICHOLAS A. KOFFROTH, ESQ. (16264)
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jmcpherson@foxrothschild.com
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zwilliams@foxrothschild.com
Counsel for Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re CASH CLOUD, INC., dba COIN CLOUD, Debtor.	Case No. BK-S-23-10423-MKN Chapter 11 ORDER GRANTING DEBTOR’S THIRD OMNIBUS MOTION FOR ENTRY OF ORDER APPROVING REJECTION OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES Hearing Date: April 20, 2023 Hearing Time: 10:30 a.m.
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The Court, having reviewed and considered Debtor’s motion (the “Motion”)¹ for an order approving the rejection of Contracts pursuant to 11 U.S.C. § 365(a); and upon consideration of the McAlary Declaration and arguments of counsel; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the

¹ Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Motion.

1 Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and
 2 venue being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper
 3 notice of the Motion having been provided; and it appearing that no other or further notice need be
 4 provided; the Court having determined that the rejection of the Contracts is a sound exercise of the
 5 Debtor's business judgment and is in the best interests of Debtor, its creditors and all other parties
 6 in interest; and that the legal and factual bases set forth in the Motion establish just cause for the
 7 relief granted herein; and upon all the proceedings had before the Court and after due deliberation
 8 and sufficient cause appearing therefor, it is hereby,

9 **ORDERED** that the Motion is **GRANTED** in its entirety; and it is further

10 **ORDERED** that the Debtor's rejection of the Rejected Contracts, attached hereto as **Exhibit**
 11 **1**, pursuant to 11 U.S.C. § 365(a) is approved effective as of the date of the filing of the Motion; and
 12 it is further

13 **ORDERED** that this Court shall retain jurisdiction to hear and determine all matters arising
 14 from the implementation or interpretation of this Order; and it is further

15 **ORDERED** that notice of the Motion as provided therein shall be deemed good and
 16 sufficient notice of the Motion.

17 Prepared And Respectfully Submitted By: APPROVED/DISAPPROVED

18 **FOX ROTHSCHILD LLP** **OFFICE OF THE UNITED STATES TRUSTEE**

19 By: /s/ Jeanette E. McPherson By: _____

20 JEANETTE E. MCPHERSON, ESQ.
 21 BRETT A. AXELROD, ESQ.
 22 NICHOLAS A. KOFFROTH, ESQ.
 23 ZACHARY T. WILLIAMS, ESQ.
 1980 Festival Plaza Drive, Suite 700
 Las Vegas, Nevada 89135

24 *Counsel for Debtor*

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 9021

In accordance with Local Rule 9021, counsel submitting this document certifies as follows:

- ☐ The Court has waived the requirement of approval in LR 9021(b)(1).
- ☐ No party appeared at the hearing or filed an objection to the motion
- ☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below:

Office of the United States Trustee

- ☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

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**EXHIBIT 1 TO ORDER
CONTRACTS TO BE REJECTED**

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)

Service Provider	Service Provider Address	Services Provided	Account No.
Bailey's Sweeper Service	5455 N. Rainbow Boulevard Las Vegas, Nevada 89130	Parking Lot/Street Sweeper	N/A
CenturyLink Communications, LLC d/b/a Lumen Technologies Group	P.O. Box 52187 Phoenix, Arizona 85072-2187	Web Hosting/DNS/Office 365/Fax/Internet/Registration Services	91255098
Cox Business	Dept. #102276 P.O. Box 1259 Oaks, Pennsylvania 19456	Telephone Line for Elevator & Alarm System	001 8610 1348 70601
Daich's First Choice Coffee Services	6295 S. Pearly Street, Suite 5 Las Vegas, Nevada 89120	Virtu 92 Coffee Machine & Related Coffee Supplies & Services	601413
DC Group, Inc.	1977 West River Road North Minneapolis, Minnesota 55411	Uninterrupted Power Supply, ONAN Generator-DECC 4482, & 1.5 Hour Load Bank Test	COINCLNV 01
Desert Fire Protection, L.P.	5040 Sobb Avenue Las Vegas, Nevada 89118	Fire Sprinkler Inspection, Fire Hydrant Inspection, & First Extinguisher Service	03CASHCL
G&G Systems	4340 W. Hacienda Ave. Las Vegas, Nevada 89118	Fire Suppression & Fire Alarm Test	2001
High Desert Landscape & Design	Attn: Angie Torres 8800 W. Lone Mountain Road Las Vegas, Nevada 89129	Perimeter Landscaping	N/A
Las Vegas Pest Control	P.O. Box 35019 Seattle, Washington 98124-3419	Rodent & Pest Control	778321
Las Vegas Valley Water District	P.O. Box 2921 Phoenix, Arizona 85062-2921	Water	6026 100 408-3
Nextgen	7165 Bermuda Rd. Las Vegas, Nevada 89119	Fire Alarm Monitoring	12928
NV Energy	P.O. Box 30150 Reno, Nevada 89520-3150	Electricity	3000 3657 4461 7161 96
Otis Elevator Company	Dept LA 21684 Pasadena, California 91185-1684	Elevator Maintenance	88294306
Quench USA, Inc.	P.O. Box 735777 Dallas, Texas 75373-5777 630 Allendale Rd., Suite 200 King Of Prussia, Pennsylvania 19406	Cold/Hot Water Dispenser & Water Service	D354418
Republic Silver State Disposal, Inc. dba Republic Services of Southern Nevada	1771 E. Flamingo Rd. Las Vegas, Nevada 89119	Recycling Service	3-0620- 0999240
Republic Silver State Disposal, Inc. dba Republic Services of Southern Nevada	P.O. Box 78829 Phoenix, Arizona 85062-8829	Trash Service	3-0620- 0999522
Siemens Industry, Inc.	C/O Citibank (Bldg Tech) P.O. Box 2134 Carol Stream, Illinois 60132-2134	Fire Panel & Alarm System (Main & Front Entrance)	30660821
Southwest Gas	P.O. Box 9890 Las Vegas, Nevada 89193-8890	Gas	9100 0292 9593
West Coast Water Solutions, LLC	9030 West Sahara Avenue, #288 Las Vegas, Nevada 89117	Ice Machine & Water Filtration Service	N/A

**FIRST OMNIBUS MOTION TO REJECT EXHIBIT 2,
NOTICE OF HEARING ON FIRST OMNIBUS MOTION TO REJECT EXHIBIT 1, AND
ORDER GRANTING FIRST OMNIBUS MOTION TO REJECT EXHIBIT 1**

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EXHIBIT 2
CONTRACTS TO BE REJECTED

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)

Service Provider	Service Provider Address	Services Provided	Account No.
Bailey's Sweeper Service	5455 N. Rainbow Boulevard Las Vegas, Nevada 89130	Parking Lot/Street Sweeper	N/A
CenturyLink Communications, LLC d/b/a Lumen Technologies Group	P.O. Box 52187 Phoenix, Arizona 85072-2187	Web Hosting/DNS/Office 365/Fax/Internet/Registration Services	91255098
Cox Business	Dept. #102276 P.O. Box 1259 Oaks, Pennsylvania 19456	Telephone Line for Elevator & Alarm System	001 8610 1348 70601
Daich's First Choice Coffee Services	6295 S. Pearly Street, Suite 5 Las Vegas, Nevada 89120	Virtu 92 Coffee Machine & Related Coffee Supplies & Services	601413
DC Group, Inc.	1977 West River Road North Minneapolis, Minnesota 55411	Uninterrupted Power Supply, ONAN Generator-DECC 4482, & 1.5 Hour Load Bank Test	COINCLNV 01
Desert Fire Protection, L.P.	5040 Sobb Avenue Las Vegas, Nevada 89118	Fire Sprinkler Inspection, Fire Hydrant Inspection, & First Extinguisher Service	03CASHCL
G&G Systems	4340 W. Hacienda Ave. Las Vegas, Nevada 89118	Fire Suppression & Fire Alarm Test	2001
High Desert Landscape & Design	Attn: Angie Torres 8800 W. Lone Mountain Road Las Vegas, Nevada 89129	Perimeter Landscaping	N/A
Las Vegas Pest Control	P.O. Box 35019 Seattle, Washington 98124-3419	Rodent & Pest Control	778321
Las Vegas Valley Water District	P.O. Box 2921 Phoenix, Arizona 85062-2921	Water	6026 100 408-3
Nextgen	7165 Bermuda Rd. Las Vegas, Nevada 89119	Fire Alarm Monitoring	12928
NV Energy	P.O. Box 30150 Reno, Nevada 89520-3150	Electricity	3000 3657 4461 7161 96
Otis Elevator Company	Dept LA 21684 Pasadena, California 91185-1684	Elevator Maintenance	88294306
Quench USA, Inc.	P.O. Box 735777 Dallas, Texas 75373-5777 630 Allendale Rd., Suite 200 King Of Prussia, Pennsylvania 19406	Cold/Hot Water Dispenser & Water Service	D354418
Republic Silver State Disposal, Inc. dba Republic Services of Southern Nevada	1771 E. Flamingo Rd. Las Vegas, Nevada 89119	Recycling Service	3-0620- 0999240
Republic Silver State Disposal, Inc. dba Republic Services of Southern Nevada	P.O. Box 78829 Phoenix, Arizona 85062-8829	Trash Service	3-0620- 0999522
Siemens Industry, Inc.	C/O Citibank (Bldg Tech) P.O. Box 2134 Carol Stream, Illinois 60132-2134	Fire Panel & Alarm System (Main & Front Entrance)	30660821
Southwest Gas	P.O. Box 9890 Las Vegas, Nevada 89193-8890	Gas	9100 0292 9593
West Coast Water Solutions, LLC	9030 West Sahara Avenue, #288 Las Vegas, Nevada 89117	Ice Machine & Water Filtration Service	N/A

**FIRST OMNIBUS MOTION TO REJECT EXHIBIT 2,
NOTICE OF HEARING ON FIRST OMNIBUS MOTION TO REJECT EXHIBIT 1, AND
ORDER GRANTING FIRST OMNIBUS MOTION TO REJECT EXHIBIT 1**